

EXHIBIT A

From: [Michael Bloch](#)
To: [John DiNucci](#)
Subject: RE: Sines v. Kessler Notice of Intent to Serve Subpoenas
Date: Thursday, June 18, 2020 12:00:00 PM

Great, thanks John. I circulate the agreement to the group.

Michael Bloch | Kaplan Hecker & Fink LLP

Counsel
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mbloch@kaplanhecker.com

From: John DiNucci <dinuuccilaw@outlook.com>
Sent: Thursday, June 18, 2020 11:38 AM
To: Michael Bloch <mbloch@kaplanhecker.com>
Subject: Re: Sines v. Kessler Notice of Intent to Serve Subpoenas

Mike,

I'll go with the flow.

Sent from my iPhone

On Jun 18, 2020, at 11:25 AM, Michael Bloch <mbloch@kaplanhecker.com> wrote:

I spoke with Campbell and Kolenich about this yesterday and we all agreed it would be better to come up with dates that don't require us having to move summary judgment dates. So we moved back proposal on the opening report to July 20. Are you ok with it under those circumstances?

Michael Bloch | Kaplan Hecker & Fink LLP

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From: John DiNucci <dinuuccilaw@outlook.com>
Sent: Thursday, June 18, 2020 11:20 AM
To: Michael Bloch <mbloch@kaplanhecker.com>
Subject: Re: Sines v. Kessler Notice of Intent to Serve Subpoenas

I am good with it, my understanding being that the SJ deadlines are being moved, too.

John

Sent from my iPhone

On Jun 18, 2020, at 11:18 AM, Michael Bloch <mbloch@kaplanhecker.com> wrote:

John, any word from Spencer on this?

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From: David Campbell <dcampbell@dhdgclaw.com>
Sent: Thursday, June 18, 2020 11:13 AM
To: Michael Bloch <mbloch@kaplanhecker.com>; James Kolenich <jek318@gmail.com>
Cc: Edward ReBrook, ESQ <rebrooklaw@gmail.com>; Bryan Jones <bryan@bjoneslegal.com>; John DiNucci <dinuuccilaw@outlook.com>; John DiNucci <dinuuccijohnm@gmail.com>; Jessica Phillips <jphillips@bsflfp.com>; Christopher Cantwell <christopher.cantwell@gmail.com>; Dillon_Hopper <Dillon_Hopper@protonmail.com>; edward@rebrooklaw.com; Justin Gravatt <jgravatt@dhdgclaw.com>; Elmer Woodard <issuecrooks@comcast.net>; Azzmador <azzmador@gmail.com>; Eli Mosley <Eli.F.Mosley@gmail.com>; Deplorable Truth <deplorabletruth@gmail.com>; eli.r.kline@gmail.com; Matthew Heimbach <matthew.w.heimbach@gmail.com>; Yotam Barkai <ybarkai@bsflfp.com>
Subject: RE: Sines v. Kessler Notice of Intent to Serve Subpoenas

All that is agreeable to me.
Thanks,
Dave

From: Michael Bloch <mbloch@kaplanhecker.com>
Sent: Thursday, June 18, 2020 7:28 AM
To: James Kolenich <jek318@gmail.com>
Cc: David Campbell <dcampbell@dhdgclaw.com>; Edward ReBrook, ESQ <rebrooklaw@gmail.com>; Bryan Jones <bryan@bjoneslegal.com>; John DiNucci <dinuuccilaw@outlook.com>; John DiNucci <dinuuccijohnm@gmail.com>; Jessica Phillips <jphillips@bsflfp.com>; Christopher Cantwell <christopher.cantwell@gmail.com>; Dillon_Hopper <Dillon_Hopper@protonmail.com>; edward@rebrooklaw.com; Justin Gravatt <jgravatt@dhdgclaw.com>; Elmer Woodard <issuecrooks@comcast.net>; Azzmador <azzmador@gmail.com>; Eli Mosley <Eli.F.Mosley@gmail.com>; Deplorable Truth <deplorabletruth@gmail.com>; eli.r.kline@gmail.com; Matthew

Heimbach <matthew.w.heimbach@gmail.com>; Yotam Barkai
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Subject: RE: Sines v. Kessler Notice of Intent to Serve Subpoenas

After speaking with Jim, we propose revising the schedule to provide more time between opening reports and the initial summary judgment deadline. So the updated proposal is:

Opening expert reports shall be submitted on or before July 20, 2020.

Rebuttal expert reports shall be submitted on or before July 31, 2020.

Expert depositions shall be completed on or before August 7, 2020.

Please let me know today whether there is any objection to those revised dates.

Michael Bloch | Kaplan Hecker & Fink LLP

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From: James Kolenich <jek318@gmail.com>

Sent: Wednesday, June 17, 2020 4:48 PM

To: Michael Bloch <mbloch@kaplanhecker.com>

Cc: David Campbell <dcampbell@dhdgclaw.com>; Edward ReBrook, ESQ
<rebrooklaw@gmail.com>; Bryan Jones <bryan@bjoneslegal.com>; John
DiNucci <dinuuccilaw@outlook.com>; John DiNucci

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Subject: Re: Sines v. Kessler Notice of Intent to Serve Subpoenas

Mike,

It seems MSJ's are due August 7. In order for this to work I think we will need to adjust the current scheduling order. I suggest moving dispositive motion and motion to exclude date back to 8/21. Everything else can remain the same although this would be a tighter than normal timeframe on responses to MSJ. Or we could kick responses to MSJ back just a few days to 8/31 and leave the remaining schedule intact.

Jim

On Wed, Jun 17, 2020 at 3:38 PM Michael Bloch

<mbloch@kaplanhecker.com> wrote:

That makes sense.

After speaking with Mr. Campbell, we propose the following dates:

Opening expert reports shall be submitted on or before July 24, 2020.

Rebuttal expert reports shall be submitted on or before July 31, 2020.

Expert depositions shall be completed on or before August 7, 2020.

Please let me know today whether there is any objection to those revised dates.

Michael Bloch | Kaplan Hecker & Fink LLP

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From: David Campbell <dcampbell@dhdgclaw.com>

Sent: Wednesday, June 17, 2020 2:07 PM

To: Michael Bloch <mbloch@kaplanhecker.com>; James Kolenich <jek318@gmail.com>; Edward ReBrook, ESQ <rebrooklaw@gmail.com>; Bryan Jones <bryan@bjoneslegal.com>; John DiNucci <dinuuccilaw@outlook.com>; John DiNucci <dinuuccijohnm@gmail.com>; Jessica Phillips <jphillips@bsfillp.com>; Christopher Cantwell <christopher.cantwell@gmail.com>; Dillon_Hopper <Dillon_Hopper@protonmail.com>; edward@rebrooklaw.com; Justin Gravatt <jgravatt@dhdgclaw.com>; Elmer Woodard <isuecrooks@comcast.net>; Azzmador <azzmador@gmail.com>; Eli Mosley <Eli.F.Mosley@gmail.com>; Deplorable Truth <deplorabletruth@gmail.com>; eli.r.kline@gmail.com; Matthew Heimbach <matthew.w.heimbach@gmail.com>; Yotam Barkai <ybarkai@bsfillp.com>

Subject: RE: Sines v. Kessler Notice of Intent to Serve Subpoenas

Mike,

No objection here. Provided the rebuttal expert reports deadline is moved to some point after opening.

Thanks,

Dave

□
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From: Michael Bloch <mbloch@kaplanhecker.com>
Sent: Wednesday, June 17, 2020 1:40 PM
To: James Kolenich <jek318@gmail.com>; David Campbell <dcampbell@dhdgclaw.com>; Edward ReBrook, ESQ <rebrooklaw@gmail.com>; Bryan Jones <bryan@bjoneslegal.com>; John DiNucci <dinuuccilaw@outlook.com>; John DiNucci <dinuuccijohnm@gmail.com>; Jessica Phillips <jphillips@bsflfp.com>; Christopher Cantwell <christopher.cantwell@gmail.com>; Dillon_Hopper <Dillon_Hopper@protonmail.com>; edward@rebrooklaw.com; Justin Gravatt <jgravatt@dhdgclaw.com>; Elmer Woodard <isuecrooks@comcast.net>; Azzmador <azzmador@gmail.com>; Eli Mosley <Eli.F.Mosley@gmail.com>; Deplorable Truth <deplorabletruth@gmail.com>; eli.r.kline@gmail.com; Matthew Heimbach <matthew.w.heimbach@gmail.com>; Yotam Barkai <ybarkai@bsflfp.com>
Subject: RE: Sines v. Kessler Notice of Intent to Serve Subpoenas

All,

With the bulk of the depositions scheduled to be taken in July, and some documents still unproduced, we would like to propose one adjustment to the discovery schedule and that is that we push the deadline to submit opening expert reports to July 24. It is currently set for June 29. Please let me know by the end of the day today whether you have any objection. I understand Mr. Kolenich has no objection. Thanks.

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From: James Kolenich <jek318@gmail.com>

Sent: Monday, June 15, 2020 9:44 PM

To: David Campbell <dcampbell@dhdgclaw.com>; Edward ReBrook, ESQ <rebrooklaw@gmail.com>; Bryan Jones <bryan@bjoneslegal.com>; John DiNucci <dinuuccilaw@outlook.com>; John DiNucci <dinuuccijohnm@gmail.com>; Jessica Phillips <jphillips@bsflfp.com>; Michael Bloch <mbloch@kaplanhecker.com>; Christopher Cantwell <christopher.cantwell@gmail.com>; Dillon_Hopper <Dillon_Hopper@protonmail.com>; edward@rebrooklaw.com; Justin Gravatt <JGravatt@dhdglaw.com>; Elmer Woodard <isuecrooks@comcast.net>; Azzmador <azzmador@gmail.com>; Eli Mosley <Eli.F.Mosley@gmail.com>; Deplorable Truth <deplorabletruth@gmail.com>; eli.r.kline@gmail.com; Matthew Heimbach <matthew.w.heimbach@gmail.com>; Yotam Barkai <ybarkai@bsflfp.com>

Subject: Re: Sines v. Kessler Notice of Intent to Serve Subpoenas

All,

Please find attached corrected subpoenas (correcting erroneous language on the original Attachment A).

On Mon, Jun 15, 2020 at 7:29 PM James Kolenich <jek318@gmail.com> wrote:

All,

Please see the attached Notice of Intent to Serve Subpoenas and accompanying subpoenas. Thank you.

--

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